

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>JOHN-PAUL CHAISSON-CARDENAS, Plaintiff, v. CHAD HIGGINS, individually and as an Iowa State University administrator; BOB DODDS, individually and as an Iowa State University administrator; JOHN LAWRENCE, individually and as an Iowa State University administrator; and STATE OF IOWA, Defendants.</p>	<p>CASE No. PETITION AND JURY DEMAND</p>
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COMES NOW Plaintiff John-Paul Chaisson-Cardenas, by and through counsel, and hereby brings his complaint against Defendants Chad Higgins, individually and as an Iowa State University administrator; Bob Dodds, individually and as an Iowa State University administrator; John Lawrence, individually and as an Iowa State University administrator, and the State of Iowa, and hereby states to the Court as follows:

INTRODUCTION

1. This is an action under and pursuant to the Iowa Civil Rights Act.

JURISDICTION

2. This is an action for injuries to a person, and as such may be brought “in a county in which the defendant, or one of the defendants, is a resident (...)" pursuant to Iowa Code section 616.18.

3. Since one or more of the Defendants reside in Polk County, this action is properly brought before the Polk County District Court.

PARTIES

4. At all times material to this Complaint, Plaintiff John-Paul Chaisson-Cardenas (hereinafter “Plaintiff”) was a citizen and resident of Polk County, Iowa and was employed by Defendant State of Iowa as Iowa 4-H Leader in the Iowa State University Extension and Outreach Services office.

5. At all times material to this Complaint, Defendant State of Iowa, a sovereign state as defined in the Iowa Code, has its principal place of business in Des Moines, Polk County, Iowa. Defendant State of Iowa provides public funds for and operates Iowa State University in Ames, Story County, Iowa. Defendant State of Iowa is responsible for the acts of its agents, Chad Higgins, John Lawrence, and Bob Dodds through the respondeat superior doctrine and/or laws of agency.

6. At all times material to this Complaint, Defendant Chad Higgins (“Defendant Higgins”) was an employee and/or agent of Iowa State University, acting in the course of his employment while furthering the business of the State of Iowa and was Plaintiff’s immediate supervisor.

7. At all times material to this Complaint, Defendant John Lawrence (“Defendant Lawrence”) was an employee and/or agent of Iowa State University, acting in the course of his employment while furthering the business of the State of Iowa and was Plaintiff’s supervisor.

8. At all times material to this Complaint, Defendant Bob Dodds (“Defendant Dodds”) was an employee and/or agent of Iowa State University, acting in the course of his employment while furthering the business of the State of Iowa and was Plaintiff’s immediate supervisor.

PROCEDURAL REQUIREMENTS

9. On September 7, 2018, within 300 days of the last discriminatory act alleged, Plaintiff submitted his Iowa Civil Rights Commission claims against Defendant State of Iowa, Defendant Higgins, Defendant Lawrence, and Defendant Dodds.

10. The Iowa Civil Rights Commission issued a Right to Sue Letter on March 13, 2019, less than ninety days prior to the filing of this petition.

FACTUAL BACKGROUND

11. Plaintiff is Native American and has Guatemalan ancestry.

12. Plaintiff was hired by Iowa State University Extension and Outreach Services (hereinafter “ISUEO”) as Iowa 4-H Leader/Director on July 25, 2014.

13. At the time of his hiring, Plaintiff was told that one of his most important goals would be to help Iowa 4-H reach a more diverse population and to become more inclusive of youth, students, and staff from all backgrounds.

14. Plaintiff worked diligently to help Iowa 4-H achieve its stated goals of inclusivity and diversity.

15. In the spring of 2017, leadership changed at ISUEO. At that time, the environment at ISUEO and in the county offices became more accommodating to discriminatory behavior, while the leadership’s interest in addressing systemic discriminatory practices evaporated.

16. In April of 2017, Plaintiff discussed the uptick in racial and ethnocentric discrimination in the ISUEO offices and throughout the Iowa 4-H program with his supervisors while completing his performance evaluation forms.

17. Plaintiff indicated to his supervisors that he had been subjected to criticism both

within the organization and by the public as a result of his efforts to make Iowa 4-H a more diverse and inclusive organization.

18. Plaintiff was subjected to comments such as “He only cares about working with Latino youth because he is Latino,” and “We need to have a real American leading 4-H.”

19. Extension professionals, University staff and students, and youth from underrepresented and underserved groups reported that they were often the targets of similar statements and sentiments in their various work environments.

20. Plaintiff asked his supervisors to address the exclusionary environment and the effects of systemic racism on the wellbeing of minority staff, students, and 4-H participants.

21. Defendants Higgins and Lawrence did not address Plaintiff’s complaints, and they took no action to rectify the discriminatory environment which had taken hold of the ISUEO and the Iowa 4-H program.

22. When it became clear that Defendants Higgins and Lawrence would not address Plaintiff’s concerns, Plaintiff contacted Dr. Reginald Stewart who was Vice-President for Diversity and Inclusion at Iowa State University.

23. Dr. Stewart told Plaintiff to document each instance of discrimination that he was aware of and to go to the Office of Equal Opportunity if the issues were not resolved.

24. Plaintiff documented the discriminatory incidents that came to his attention.

25. On several occasions, Plaintiff was chastised for “overreacting” when he attempted to address racist behaviors perpetrated by 4-H participants.

26. On one such occasion, which occurred during the 2017 Iowa State Fair, Plaintiff asked the Iowa Hereford Breeders Association to remove a sign that it had posted which boasted “Every Calf Deserves a White Face,” and featured the body of a white child wearing a 4-H t-

shirt, with a cut-out space for a participant's face.

27. After Plaintiff asked the Iowa Hereford Breeders Association to remove its sign, Defendant Lawrence told Plaintiff that he had overreacted and that he should have just "let it go."

28. Another incident took place on September 6, 2017. That day, a group of young people in Creston, Iowa, donned white hoods and took up weapons, in apparent homage to the Ku Klux Klan and set a cross afire in an open field.

29. The incident was photographed and ended up in the press.

30. Plaintiff learned that four of the five youths pictured were recent or active members of Iowa 4-H.

31. Plaintiff emailed his supervisors, Defendant Higgins and Defendant Lawrence, regarding the incident and asked them how they intended to handle the issue.

32. Defendants Higgins and Lawrence made it clear that they did not intend to respond, and Defendant Dodds, the Assistant Vice-President of ISUEO, chastised Plaintiff and told him that he was overreacting.

33. On September 22, 2017, Plaintiff filed a complaint with Defendant Higgins in which he discussed several incidents where applicants of color had not been hired by ISUEO, in spite of having excellent qualifications.

34. On February 2, 2018, Plaintiff complained to the entire Senior ISUEO Leadership Team, which included Defendants Higgins and Lawrence, regarding his concerns about the treatment of diverse Iowa 4-H staff by Regional Directors.

35. As his work continued, Plaintiff became aware of Iowa 4-H youth and staff who felt threatened due to their national origin, race, ethnicity, or sexual orientation.

36. Plaintiff also became aware of issues between county-level staff and volunteers and some of the program's transgender youth.

37. The transgender youth issue came to the forefront after one of Plaintiff's staff members requested resources for making transgender youth feel safe within the program and for assistance in helping the youth to make a name change with the organization.

38. Plaintiff began to research and draft program-level policy and guidance to operationalize existing Iowa law and Iowa State University policy in the context of 4-H.

39. On February 15, 2018, Plaintiff emailed Defendant Higgins and asked him to place the trans-youth conversation on the Leadership Team Agenda for discussion.

40. On March 6, 2018, Plaintiff forwarded an email from a staff member, Norma Dorado Robles, to the Iowa State University Office of Equal Opportunity ("ISU OEO").

41. In the email, Ms. Dorado Robles discussed several examples of racist behavior by county staff.

42. After forwarding Ms. Dorado Robles' email to the ISU OEO, pursuant to Iowa State University's policy, Plaintiff received an email from ISUEO Human Resources questioning his decision to forward the email.

43. That same day, Plaintiff submitted a formal complaint on his own behalf, and on Ms. Dorado Robles' behalf, to the ISU OEO.

44. On March 12, 2018, Plaintiff provided a copy of the National 4-H Guidance on accommodating transgender youth to the ISUEO Leadership Team.

45. Plaintiff requested feedback and input on the policy and was told that he should not change the policy significantly when drafting the Iowa-specific version so that the state policy would remain consistent with the national guidance.

46. Plaintiff complied with the Leadership Team's request and drafted an Iowa policy/guidance that was very similar to the national policy.

47. On March 12, 2018, Defendants Higgins and Lawrence asked Plaintiff to draft an award nomination for himself for the 4-H National Diversity Award.

48. On March 13, 2018, Bonita Williams from the National Institute of Food and Agriculture ("NIFA") and the United States Department of Agriculture ("USDA") gave Plaintiff federal permission to use the national transgender youth policy and to link the policy from the federal government's website.

49. That same day, Plaintiff provided a hard copy of the proposed Iowa policy/guidance to Defendant Higgins for his review and for Defendant Lawrence's approval.

50. On March 19, 2018, Plaintiff provided hard copies of the proposed Iowa 4-H transgender youth policy/guidance to the Leadership Team, along with a PowerPoint presentation explaining why the policy was important.

51. No member of the Leadership Team made any recommendations for changes.

52. Defendant Higgins was present at the Leadership Team meeting and presided over it.

53. On March 20, 2018, Plaintiff submitted the self-evaluation portions of his performance evaluation and discussed his training as a social worker, his belief in social justice, and his conviction that civil rights laws must be enforced.

54. On March 21, 2018, the draft Iowa transgender youth policy/guidance was placed on the ISUEO website for public comment. Plaintiff indicated in the 4-H staff newsletter that the policy was posted and available for comment.

55. On March 27, 2018, the USDA and NIFA pulled the national transgender youth

policy/guidance from its website.

56. On April 2, 2018, Plaintiff received a complaint that county-level Civil Rights Reports were not being completed, or were being completed inaccurately.

57. Plaintiff contacted Kayla Black, with ISUEO Human Resources, requesting a copy of the Civil Rights Reports.

58. Despite the fact that the reports contain public information, Ms. Black refused to provide them to Plaintiff.

59. Plaintiff requested the Civil Rights Reports directly from the counties and had his staff review them.

60. On April 4, 2018, World News Daily, a hate group recognized by the Southern Poverty Law Center, released an article targeting Plaintiff and Iowa 4-H for its proposed transgender youth policies.

61. After World News Daily's article was published, ISUEO began to receive hate mail.

62. Plaintiff personally received threats of bodily harm and various degrading attacks.

63. Plaintiff reported these attacks to Defendant Higgins, who told Plaintiff to not make things "bigger than they are."

64. Defendant Lawrence began to receive calls from high-level federal government officials who were not pleased with the proposed policy or the negative publicity.

65. On April 6, 2018, Plaintiff had his performance review with Defendant Higgins.

66. Defendant Higgins gave Plaintiff an overall score of "Meets Expectations," but instructed Plaintiff not to continue to "stir the pot on the civil rights thing."

67. Other news outlets published stories regarding the Iowa 4-H transgender policy,

and the hate mail continued.

68. On April 8, 2018, Plaintiff emailed the ISUEO Leadership Team and urged its members to stand firm despite the hate mail and negative comments.

69. On April 20, 2018, Plaintiff received an email from Defendant Higgins in which Defendant Higgins expressed his concern that Plaintiff was having his staff review the Civil Rights Reports.

70. Plaintiff reached out to Defendant Lawrence and the Leadership Team in an attempt to spark a conversation about civil rights within ISUEO.

71. On May 9, 2018, Plaintiff and Defendant Higgins attended the Iowa State University Campus Climate Survey release.

72. The Campus Climate Survey was a survey intended to “provide a snapshot of ISU community members’ perceptions of living, learning and working environment at Iowa State.”

73. At the meeting, Plaintiff spoke about ISUEO’s need for continued improvement in the civil rights arena.

74. Defendant Higgins angrily left the meeting after Plaintiff spoke.

75. On May 10, 2018, Plaintiff was called into a meeting with Defendants Higgins and Lawrence.

76. Plaintiff was told that a disciplinary letter was being placed in his file and that a new transgender youth policy was being developed and implemented.

77. Defendants Lawrence and Higgins told Plaintiff that he should remove all policy/guidance from the Iowa 4-H website.

78. Plaintiff was told that he had not followed the proper procedures for implementing new policy/guidance.

79. When Plaintiff produced an email from Defendant Higgins in which Higgins articulated the procedure that Plaintiff had followed, Plaintiff was sent home for the rest of the week.

80. Defendants Higgins and Lawrence indicated that Plaintiff should begin looking for other employment.

81. On May 11, 2018, Plaintiff filed a complaint of retaliation with the ISU OEO.

82. The ISU OEO did not take any action on Plaintiff's formal complaint filed with ISU OEO on March 6, 2018, or his subsequent retaliation complaint filed with ISU OEO on May 11, 2018.

83. On May 20, 2018, Plaintiff received an accommodation request from a transgender youth who wanted to attend the programs related to the state youth leadership conference.

84. Plaintiff forwarded the request to Defendants Higgins and Lawrence, and followed up several times, but did not receive any guidance from either Defendant.

85. The day before the youth was to attend the beginning of the program, Plaintiff had not received any guidance from Defendants Higgins or Lawrence.

86. Plaintiff wanted the transgender youth to be able to attend the conference, and as such drafted an interim accommodation policy so that the youth would feel safe to attend.

87. In his email describing the interim policy, Plaintiff included a "gender neutral bathrooms" list that had been created by ISU.

88. Plaintiff also included this list in the conference packet, in the event that other transgender youth would be attending that might need accommodations.

89. Within an hour of sending the accommodation email, Defendant Higgins called to

scold Plaintiff and to opine that the list was “inappropriate.”

90. On May 30, 2018, Plaintiff received a call from Human Resources, and was told that the disciplinary letter of May 10, 2018 had been removed from his file and that Defendant Lawrence had not intended to imply that he would be fired.

91. On August 2, 2018, Plaintiff met with Defendants Higgins and Lawrence and was told that he was being fired because “his inclusion work was getting in the way of *our* Extension work.”

92. The termination letter provided simply stated that the University was exercising its right to fire Plaintiff as an at-will employee; however, the University later released a statement to the Des Moines Register which provided that Plaintiff had a “documented inability to foster a positive and collaborative work environment . . . [and] a tendency to focus on individual tactical projects while neglecting the overall strategic direction of the Iowa 4-H program.”

93. Plaintiff has never been placed on a performance improvement plan or been formally disciplined for any of the behavior outlined by Defendant State of Iowa in its statement to the press.

**COUNT I –
VIOLATION OF IOWA CODE CHAPTER 216
HARASSMENT AND DISCRIMINATION ON THE BASIS OF
RACE AND NATIONAL ORIGIN
AGAINST ALL DEFENDANTS**

94. Plaintiff herein incorporates paragraphs 1-93.

95. Plaintiff is Native American and has Guatemalan ancestry and as such is a member of protected classes under the Iowa Civil Rights Act, Iowa Code Chapter 216.

96. Defendants discriminated against Plaintiff with respect to his employment based

on his national origin and race, permitted harassment against Plaintiff, maintained a hostile work environment, and discharged him, all as set forth above, in violation of Iowa Code Chapter 216.

97. Defendants engaged in a continuing pattern and practice of race and national origin discrimination and harassment and created a hostile work environment in violation of the Iowa Civil Rights Act, Iowa Code Chapter 216.

98. Plaintiff's race and national origin were motivating factors in the discrimination, harassment, and hostile work environment.

99. The harassment was unwelcome.

100. The harassment was sufficiently severe, pervasive, and offensive that a reasonable person would find Plaintiff's work environment to be hostile or abusive.

101. The discrimination and harassment affected a term, condition, and/or privilege of Plaintiff's employment.

102. Defendants knew or should have known of the conduct long before it was reported by Plaintiff.

103. After Plaintiff reported the conduct, Defendants failed to take appropriate remedial action.

104. Defendants' violations of Iowa Code Chapter 216 are a cause of the injuries suffered by Plaintiff.

105. As a result of Defendants' actions, Plaintiff suffered and will continue to suffer mental and emotional harm and anguish, anxiety, fear, loss of enjoyment of life, degradation, disgrace, uncertainty, apprehensiveness, grief, restlessness, dismay, and has in the past and will in the future suffer loss of wages, benefits, and other emoluments of employment.

WHEREFORE, Plaintiff prays for the following relief:

- a) That Defendants' conduct be declared to be in violation of Plaintiff's rights as outlined by Iowa Code Chapter 216;
- b) That Defendants and their officers, employees, agents, attorneys, successors, and assigns, and those acting in concert therewith be enjoined from any conduct violating Plaintiff's rights or the rights of others similarly situated as secured by Chapter 216 of the Iowa Code, and that the court order such other injunctive relief as necessary to prevent Defendants from continuing their discriminatory practices and to protect others similarly situated;
- c) That Plaintiff be awarded compensatory damages;
- d) That Plaintiff be made whole by providing him appropriate lost earnings and benefits with pre-judgment interest, and other affirmative relief;
- e) That Plaintiff be made whole by providing him compensation for the past and future mental and emotional harm and anguish, and other affirmative relief;
- f) That Plaintiff be awarded reasonable attorneys' fees and costs incurred in prosecuting this action; and
- g) That Plaintiff be awarded such additional and further relief as is just and proper.

**COUNT II –
VIOLATION OF IOWA CODE CHAPTER 216
RETALIATION FOR COMPLAINTS OF HARASSMENT AND DISCRIMINATION
ON THE BASIS OF RACE AND NATIONAL ORIGIN
AGAINST ALL DEFENDANTS**

106. Plaintiff herein incorporates paragraphs 1-105.

107. Plaintiff reported discrimination and harassment against him on the basis of race and national origin to Defendants.

108. Plaintiff opposed this unlawful discrimination and harassment.

109. Plaintiff's complaints were protected activities under Iowa Code Chapter 216.

110. As a result of Plaintiff's reports and opposition, Defendants retaliated against Plaintiff by taking adverse employment actions against Plaintiff, up to and including termination.

111. Defendants engaged in a continuing pattern and practice of retaliating against those who, like Plaintiff, complained appropriately about race and national origin discrimination and harassment in violation of the Iowa Civil Rights Act, Iowa Code Chapter 216, in spite of Plaintiff's reports and opposition.

112. Defendants' violations of Iowa Code Chapter 216 are a cause of the injuries suffered by Plaintiff.

113. As a result of Defendants' actions, Plaintiff suffered and will continue to suffer mental and emotional harm and anguish, anxiety, fear, loss of enjoyment of life, degradation, disgrace, uncertainty, apprehensiveness, grief, restlessness, dismay, and has in the past and will in the future suffer loss of wages, benefits, and other emoluments of employment

WHEREFORE, Plaintiff prays for the following relief:

a) That Defendants' conduct be declared to be in violation of Plaintiff's rights as outlined by Iowa Code Chapter 216;

b) That Defendants and their officers, employees, agents, attorneys, successors, and assigns, and those acting in concert therewith be enjoined from any conduct violating Plaintiff's rights or the rights of others similarly situated as secured by Chapter 216 of the Iowa Code, and that the court order such other injunctive relief as necessary to prevent Defendants from continuing their discriminatory practices and to protect others similarly situated;

c) That Plaintiff be awarded compensatory damages;

- d) That Plaintiff be made whole by providing him appropriate lost earnings and benefits with pre-judgment interest, and other affirmative relief;
- e) That Plaintiff be made whole by providing him compensation for the past and future mental and emotional harm and anguish, and other affirmative relief;
- f) That Plaintiff be awarded reasonable attorneys' fees and costs incurred in prosecuting this action; and
- g) That Plaintiff be awarded such additional and further relief as is just and proper.

**COUNT III –
VIOLATION OF IOWA CODE CHAPTER 216
RETALIATION FOR COMPLAINTS OF SEXUAL ORIENTATION, GENDER
IDENTITY, AND RACE DISCRIMINATION
AGAINST ALL DEFENDANTS**

- 114. Plaintiff herein incorporates paragraphs 1-113.
- 115. Plaintiff reported discrimination and harassment of members or potential members of 4-H on the basis of race, sexual orientation, and gender identity to Defendants.
- 116. Plaintiff opposed this unlawful discrimination and harassment.
- 117. Plaintiff's complaints were protected activities under Iowa Code Chapter 216.
- 118. As a result of Plaintiff's reports and opposition, Defendants retaliated against Plaintiff by taking adverse employment actions against Plaintiff, up to and including termination.
- 119. Defendants engaged in a continuing pattern and practice retaliating against those who, like Plaintiff, complained of race, sexual orientation, and gender identity discrimination and harassment in violation of the Iowa Civil Rights Act, Iowa Code Chapter 216, in spite of Plaintiff's reports and opposition.
- 120. Defendants' violations of Iowa Code Chapter 216 are a cause of the injuries

suffered by Plaintiff.

121. As a result of Defendants' actions, Plaintiff suffered and will continue to suffer mental and emotional harm and anguish, anxiety, fear, loss of enjoyment of life, degradation, disgrace, uncertainty, apprehensiveness, grief, restlessness, dismay, and has in the past and will in the future suffer loss of wages, benefits, and other emoluments of employment.

WHEREFORE, Plaintiff prays for the following relief:

- a) That Defendants' conduct be declared to be in violation of Plaintiff's rights as outlined by Iowa Code Chapter 216;
- b) That Defendants and their officers, employees, agents, attorneys, successors, and assigns, and those acting in concert therewith be enjoined from any conduct violating Plaintiff's rights or the rights of others similarly situated as secured by Chapter 216 of the Iowa Code, and that the court order such other injunctive relief as necessary to prevent Defendants from continuing their discriminatory practices and to protect others similarly situated;
- c) That Plaintiff be awarded compensatory damages;
- d) That Plaintiff be made whole by providing him appropriate lost earnings and benefits with pre-judgment interest, and other affirmative relief;
- e) That Plaintiff be made whole by providing him compensation for the past and future mental and emotional harm and anguish, and other affirmative relief;
- f) That Plaintiff be awarded reasonable attorneys' fees and costs incurred in prosecuting this action; and
- g) That Plaintiff be awarded such additional and further relief as is just and proper.

**COUNT IV –
VIOLATION OF IOWA CODE CHAPTER 216
HARASSMENT AND DISCRIMINATION ON THE BASIS OF RACE, SEXUAL
ORIENTATION, AND GENDER IDENTITY (BYSTANDER CLAIM)
AGAINST ALL DEFENDANTS**

122. Plaintiff herein incorporates paragraphs 1-122.

123. Defendants engaged in a continuing pattern and practice of unwelcome discrimination and harassment based on race, sexual orientation, and gender identity directed at third parties and created a hostile environment in violation of the Iowa Civil Rights Act, Iowa Code Chapter 216.

124. Plaintiff witnessed this discrimination and harassment, found it unwelcome, and reported it to Defendants.

125. The harassment was sufficiently severe, pervasive, and offensive that a reasonable person would find the environment to be hostile or abusive.

126. The discrimination and harassment affected a term, condition, and/or privilege of Plaintiff's employment.

127. Defendants' violation of Iowa Code Chapter 216 is a cause of the injuries suffered by Plaintiff.

128. As a result of Defendants' actions, Plaintiff suffered and will continue to suffer mental and emotional harm and anguish, anxiety, fear, loss of enjoyment of life, degradation, disgrace, uncertainty, apprehensiveness, grief, restlessness, dismay, and has in the past and will in the future suffer loss of wages, benefits, and other emoluments of employment.

WHEREFORE, Plaintiff prays for the following relief:

a) That Defendants' conduct be declared to be in violation of Plaintiff's rights as outlined by Iowa Code Chapter 216;

b) That Defendants and their officers, employees, agents, attorneys, successors, and assigns, and those acting in concert therewith be enjoined from any conduct violating Plaintiff's rights or the rights of others similarly situated as secured by Chapter 216 of the Iowa Code, and that the court order such other injunctive relief as necessary to prevent Defendants from continuing their discriminatory practices and to protect others similarly situated;

c) That Plaintiff be awarded compensatory damages;

d) That Plaintiff be made whole by providing him appropriate lost earnings and benefits with pre-judgment interest, and other affirmative relief;

e) That Plaintiff be made whole by providing him compensation for the past and future mental and emotional harm and anguish, and other affirmative relief;

f) That Plaintiff be awarded reasonable attorneys' fees and costs incurred in prosecuting this action; and

g) That Plaintiff be awarded such additional and further relief as is just and proper.

JURY DEMAND

COMES NOW Plaintiff, by and through counsel, and hereby demands a trial by jury in this matter.

/s/ Roxanne Conlin
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